

RECEIVED IN CLERK'S OFFICE
DATE 2/11/25

EXHIBIT 1

Law Office of Luke P. Travis

P.O. BOX 3288
10 NORTH MAIN STREET
FALL RIVER, MASSACHUSETTS 02722-3288

TEL: (508) 676-3333
FAX: (508) 676-1698
Email: luke@bristollegal.com

TID: 27-2415588

October 17, 2018

Karen M. Cronan aka Karen M. Cronin aka
Karen Merritt Cronan aka Karen R. Merritt
7 Brayton Woods Drive
Rehoboth, MA 02769

RE: Real Estate Loan Transaction dated: September 17, 2010
Mortgaged Premises: 7 Brayton Woods Drive, Rehoboth, MA

Dear Ms. Cronan:

Please be advised that this office represents PENSICO Trust Company Custodian FBO James P. Tiernan, IRA and PENSICO Trust Company Custodian FBO Richard J. Fagan, IRA (hereinafter collectively "Lender"), with respect to the above matter.

My client has informed me that you have been in default in payments due on the above-referenced indebtedness since September 17, 2011. As a result of said default, in the name of and on behalf of the Lender, I hereby make demand for payment in full of all sums currently due to the Lender, including unpaid principal, accrued interest, late charges, and attorney's fees. Unless this payment in full is made within 150 days of receipt of this letter, the outstanding principal balance on this account, plus accrued interest, late charges and attorney's fees shall become due and payable. Per the attached, as of September 30, 2018 the outstanding principal balance is One Million Eleven Thousand Five Hundred Seventy Two and 00/100 (\$1,011,572.00) Dollars. The per diem is \$345.86. Per the attached, an additional amount of One Hundred Twenty Thousand Six Hundred Thirty Five and 44/100 Dollars (\$120,635.44) is due and payable for real estate taxes, homeowners insurance and legal fees for collection which have been paid by your lender.

Pursuant to Massachusetts General Laws Chapter 35A, be further advised that unless payment in full is made as set forth above within 150 day of the date of this letter, I have been instructed by my client to initiate foreclosure proceedings against the property which is security for this indebtedness. Please contact this office, and we can provide you with the total amount due on this loan. If you disagree with the default or calculation of balance, you may contact me at the address and phone number above. If you have any questions, you or your attorney should contact me. No partial payments of sums currently due to the Lender will be accepted.

You may be eligible for assistance from the Massachusetts Housing Finance Agency (800-882-1154) or the Massachusetts Division of Banks (617-956-1501).

Very truly yours,
Law Office of Luke P. Travis, P.C.


Luke P. Travis

REGULAR MAIL and CERTIFIED MAIL

MORTGAGED PROPERTY: 7 Brayton Woods Drive, Rehoboth, MA
BORROWERS: Karen R. Merritt and James M. Cronan

Original Amount \$146,500			Original Amount \$165,000		
9.17.10	Principal	\$146,500.00	9.17.10	Principal	\$165,000.00
	Interest	\$26,370.00 (18% interest on \$146,500 orig. amt. Principal ("P"))		Interest	\$29,700.00
	3% Fee	\$5,186.10		3% Fee	\$5,841.00
9.17.11	Principal	\$178,056.10 (21.54% interest on P + 3% Fee)	9.17.11	Principal	\$200,541.00 (interest %'s same on this loan)
9.17.12	Interest	\$26,708.42 (18.23% interest on P)	9.17.12	Interest	\$30,081.15
	Principal	\$204,764.52		Principal	\$230,622.15
9.17.13	Interest	\$30,714.68 (20.97% interest on P)	9.17.13	Interest	\$34,593.32
	Principal	\$235,479.19		Principal	\$265,215.47
9.17.14	Interest	\$35,321.88 (24.11% interest on P)	9.17.14	Interest	\$39,782.32
	Principal	\$270,801.07		Principal	\$304,997.79
9.17.15	Interest	\$40,620.16 (27.73% interest on P)	9.17.15	Interest	\$45,749.67
	Principal	\$311,421.23		Principal	\$350,747.46
9.17.16	Interest	\$46,713.18 (31.89% interest on P)	9.17.16	Interest	\$52,612.12
	Principal	\$358,134.42		Principal	\$403,359.58
9.17.17	Interest	\$53,720.16 (36.67% interest on P)	9.17.17	Interest	\$60,503.94
	Principal	\$411,854.58		Principal	\$463,863.52
9.17.18	Interest	\$61,778.19 (42.17% interest on P)	9.17.18	Interest	\$69,579.53
	Principal	\$473,632.77		Principal	\$533,443.05
9.30.18	Interest	<u>\$2,114.58</u>	9.30.18	Interest	<u>\$2,381.60</u>
	BALANCE	\$475,747.35		BALANCE	\$535,824.65

Added to the above balances:

Real Estate Taxes Paid to Town of Rehoboth:	\$88,887.39
Forced Placed Homeowners Insurance	\$12,589.37
Legal Fees/Costs of Collection	<u>\$19,158.68</u>
TOTAL ADDITIONAL AMOUNTS DUE	\$120,635.44

*Lenders improperly charged compound interest (i.e., interest on overdue interest) at 15% each year (after 18% first year) rather than simple annual interest as called for in the notes and mandated under MA law. By charging compound interest the interest rates charged went well above the maximum 20% legal amount and thus violate the criminal usury statute. (The annual interest rate is calculated using the following formula: $I/Pt = r$.)

Running this forward the next two years, the lenders charged 48.46% interest on 9/17/2019 and 55.77% interest on 9/17/2020. Applying that interest charged, as of 9/17/2020, the amount claimed by the lenders would have been \$626,379.34 and \$705,478.43 respectively, for a total outstanding principal balance of \$1,331,857.77.

Thus, on the original \$311,500 loans, the lenders charged well over \$1 million in interest.

EXHIBIT 2



The Commonwealth of Massachusetts

OFFICE OF THE SHERIFF

County of Bristol

PAUL HEROUX, SHERIFF

108 Court Street • P.O. Box 8928
New Bedford, MA 02740



Tel: 508-992-6631
Fax: 508-991-6016

October 7, 2024

Karen R Merritt
7 Brayton Woods Drive
Rehoboth, MA 02769

You are hereby notified that pursuant to an execution for possession, issued by the Taunton Housing Court, Docket # 20H83CV00167TA, I will take possession of the premises that you now hold by physically removing you and your personal property on 10/10/2024 at 9:00AM in the forenoon. After this date and time, you will no longer be able to enter the premises to retrieve any belongings. Any personal property remaining will be placed in a licensed public warehouse.

If you vacate the premises prior to the above date, you must make arrangements with the deputy sheriff's office for the return of the keys.

Robert Brassard
Deputy Sheriff
108 Court Street
New Bedford, MA 02740
508-992-6631

MOVING AND STORAGE COMPANY INFORMATION:	
NAME:	Southcoast Moving, Storage and Property Management, LLC
ADDRESS:	449 Bolton Street, New Bedford, MA 02740
TELEPHONE#:	508-984-4111 (office) 508-997-2337 (fax)

Please note that the above movers may sell at auction any property unclaimed after six months and may retain that portion of the proceeds necessary to compensate the warehouseman for unpaid storage fees accrued as of the date of auction except as provided by G.L. c. 239 section 4. You may obtain the storage rates by contacting the Commissioner of the Division of Occupational Licensure at 1000 Washington Street Suite 710, Boston, MA 02118 -- Tel# (617)701-8600.

You should notify the above mover in writing at the business address above of any change in your mailing address so they can properly notify you if you fail to retrieve your property.

Acushnet • Attleboro • Berkley • Dartmouth • Dighton • Easton • Fairhaven • Fall River • Freetown • Mansfield
New Bedford • North Attleboro • Norton • Raynham • Rehoboth • Seekonk • Somerset • Swansea • Taunton • Westport

EXECUTION FOR POSSESSION AND MONEY JUDGMENT		DOCKET NUMBER 20H83CV00167TA	Trial Court of Massachusetts Housing Court Department
CASE NAME: L&s Realty, Llc v. James M Cronan et al			
JUDGMENT- DEBTOR(S) AGAINST WHOM EXECUTION IS ISSUED James M. Cronan Karen R. Merritt Molly Cronan Joseph Cronan Charles Cronan		COURT NAME & ADDRESS Southeast Housing Court - Taunton 40 Broadway Street, Suite 1306 Taunton, MA 02780 (508)977-4950	
JUDGMENT- CREDITOR(S) (OR CREDITOR'S ATTORNEY) WHO MUST ARRANGE SERVICE OF EXECUTION John T Fiegel, Esq. Godbout Law, PLLC 33 Broad St 11th Flr Boston, MA 02109		JUDGMENT- CREDITOR(S) IN WHOSE FAVOR EXECUTION IS ISSUED L&s Realty, Llc	
PREMISES ADDRESS: 7 Brayton Woods Drive Rehoboth MA 02769		FURTHER ORDERS OF THE COURT:	
<p>TO THE SHERIFFS OF THE SEVERAL COUNTIES OR THEIR DEPUTIES, OR ANY CONSTABLE OF ANY CITY OR TOWN WITHIN THE COMMONWEALTH:</p> <p>The Judgment- Creditor(s) named above has/have recovered Judgment and Possession of the subject premises shown above, which were leased or rented for dwelling purposes against the Judgment-Debtor(s) named above on</p> <p>MONEY JUDGMENT: WE COMMAND YOU, therefore, to collect the below sum, with your fees, of the money of said Judgment-Debtor(s), his or her goods, chattels, lands or tenements, in any manner permitted by law, and to return this writ satisfied or unsatisfied, to the clerk of this Court, all within <u>twenty years</u> from the "Date Judgment Entered", or within ten days after this writ has been satisfied or discharged.</p> <p>POSSESSION JUDGMENT: WE COMMAND YOU, therefore, to deliver said premises to the Judgment-Creditor(s) in accordance with the requirements of G.L. c. 235, § 23 and G.L. c. 239, § 3, to cause the Judgment-Creditor(s) to have possession of the premises shown above without delay.</p> <p>This Writ of Execution is valid until 12/30/2024 for <u>possession only</u>. This form must be returned to the Clerk-Magistrate's office of this court, along with your return of service, within ten days after this judgment for possession has been satisfied or discharged, or after 12/30/2024 if this judgment remains unsatisfied or undischarged.</p> <p>NOTICE TO OFFICER: This Writ of Execution for possession is valid until 12/30/2024.</p>			
1. Date Judgment Entered		09/20/2021	
2. Compensatory Damages		\$32,882.60	
3. Punitive Damages		\$	
4. Attorney Fees (if any)		\$	
5. Prejudgment Interest		\$	
6. Court Costs		\$706.54	
7. Judgment Total		\$33,589.14	
8. Postjudgment Interest		\$12,233.27	
9. EXECUTION TOTAL (Lines 2 + 5 + 6 + 8, plus Line 3 & Line 4, if any)		\$45,822.41	
RETURN OF SERVICE: <input type="checkbox"/> Satisfied as to BOTH <input type="checkbox"/> Satisfied as to Money Judgment ONLY <input type="checkbox"/> Satisfied as to Possession ONLY			
TESTE OF FIRST JUSTICE		CLERK-MAGISTRATE LAST. SIGNED	
WITNESS: Hon. Donna Salvadio		DATE EXECUTION ISSUED: 10/01/2024 X <i>Joseph D. McIntyre</i>	

Date/Time Printed: 10-01-2024 10:47:57

HC027: 5/2019

EXHIBIT 3

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#1


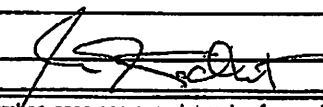
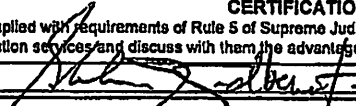
CIVIL ACTION COVER SHEET		DOCKET NUMBER 2573CV0006C	Massachusetts Trial Court Superior Court	
Plaintiff: 80 Fountain Street, LLC		Defendant: James M. Cronan		
ADDRESS: 80 Fountain Street Pawtucket, RI 02860		ADDRESS: 25 Morgan Avenue Warwick, RI 02889		
BRISTOL SUPERIOR COURT				
Plaintiff Attorney: Blake J. Godbout		Defendant: Karen Merritt		
ADDRESS: 33 Broad St. 11th Floor Boston, MA 02109		ADDRESS: 91 Oak Street Norton, MA 02768		
BBO: 198380				
JENNIFER A. SULLIVAN, ESQ. CLERK/MAGISTRATE				
CODE NO. E99		TYPE OF ACTION AND TRACK DESIGNATION (see instructions section on next page)		
COMPLAINT TO REGISTER JUDGMENT		TRACK F HAS A JURY CLAIM BEEN MADE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
*If "Other" please describe: _____				
<div style="display: flex; justify-content: space-between;"> <div> Is there a claim under G.L. c. 93A? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO </div> <div> Is there a class action under Mass. R. Civ. P. 23? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO </div> </div> <p style="text-align: center;">STATEMENT OF DAMAGES REQUIRED BY G.L. c. 212, § 3A</p> <p>The following is a full, itemized and detailed statement of the facts on which the undersigned plaintiff or plaintiff's counsel relies to determine money damages. (Note to plaintiff: for this form, do not state double or treble damages; indicate single damages only.)</p> <p style="text-align: center;">TORT CLAIMS</p> <p>A. Documented medical expenses to date</p> <ol style="list-style-type: none"> 1. Total hospital expenses _____ 2. Total doctor expenses _____ 3. Total chiropractic expenses _____ 4. Total physical therapy expenses _____ 5. Total other expenses (describe below) _____ <div style="border: 1px solid black; width: 50%; margin-left: 140px; height: 20px;"></div> <p style="text-align: right;">Subtotal (1-5): \$0.00</p> <p>B. Documented lost wages and compensation to date _____</p> <p>C. Documented property damages to date _____</p> <p>D. Reasonably anticipated future medical and hospital expenses _____</p> <p>E. Reasonably anticipated lost wages _____</p> <p>F. Other documented items of damages (describe below) _____</p> <div style="border: 1px solid black; width: 50%; margin-left: 140px; height: 20px;"></div> <p style="text-align: right;">\$281,336.03</p> <p style="text-align: right;">TOTAL (A-F): \$281,336.03</p> <p>G. Briefly describe plaintiff's injury, including the nature and extent of the injury: COMPLAINT TO REGISTER JUDGMENT</p>				
CONTRACT CLAIMS				
<input type="checkbox"/> This action includes a claim involving collection of a debt incurred pursuant to a revolving credit agreement. Mass. R. Civ. P. 8.1(a).				
Item #	Detailed Description of Each Claim		Amount	
1.				
Total				
Signature of Attorney/Self-Represented Plaintiff: X 		Date: 1/6/25		
RELATED ACTIONS: Please provide the case number, case name; and county of any related actions pending in the Superior Court.				
CERTIFICATION UNDER S.J.C. RULE 1:18(5)				
I hereby certify that I have complied with requirements of Rule 5 of Supreme Judicial Court Rule 1:18: Uniform Rules on Dispute Resolution, requiring that I inform my clients about court-connected dispute resolution services and discuss with them the advantages and disadvantages of the various methods of dispute resolution.				
Signature of Attorney: X 		Date: 1/6/25		

EXHIBIT 4

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COMMONWEALTH OF MASSACHUSETTS

BRISTOL, ss.

BRISTOL SUPERIOR COURT
FILEDBRISTOL SUPERIOR COURT
CIVIL ACTION NO.

2573CV0006 C

JAN - 6 2025

80 FOUNTAIN STREET, LLC

JENNIFER A. SULLIVAN, ESQ.
CLERK/MAGISTRATE

Plaintiff,

v.

**VERIFIED COMPLAINT TO
REGISTER JUDGMENT**JAMES CRONAN and
KAREN MERRITT

Defendants.

COMPLAINT TO REGISTER JUDGMENT

Plaintiff, 80 Fountain Street, LLC ("80 Fountain"), brings this action pursuant to U.S. Const. Art. IV §1, the Constitution's Full Faith and Credit Clause, to register the original judgment (the "Judgment") entered in the United States Bankruptcy Court for the District of Rhode Island on November 30, 2012 against Defendant James M. Cronan ("Cronan") and Defendant Karen Cronan (now, Karen Merritt)¹ ("Merritt") (collectively, the "Defendants"), in bankruptcy case number 10-10837 (the "Bankruptcy") and adversary proceeding number 11-1036 (the "Adversary Proceeding"). A copy of the Judgment is attached hereto as Exhibit A.

PARTIES

1. Plaintiff 80 Fountain is a Rhode Island limited liability company with a principal place of business at 80 Fountain Street, Pawtucket, RI.

¹ The Adversary Proceeding Defendants James M. Cronan and Karen Cronan are now divorced and Karen Cronan now goes by her maiden name, Karen Merritt.

2. Defendant Cronan resides at 25 Morgan Avenue, Warwick, RI.
3. Defendant Merritt resides at 91 Oak Street, Norton, MA.

JURISDICTION AND VENUE

1. Under U.S. Const. Art. IV §1, this Court has jurisdiction to recognize and give full faith and credit to the Judgment. 28 U.S.C.S. § 1738.
2. Jurisdiction is properly conferred by M.G.L. ch. 212 §3, ch. 214 § 4, and ch. 223A § 3.
3. Venue is proper in this Court pursuant to M.G.L. c. 223 § 1 because the Defendant Karen Merritt is a resident of Bristol County.

FACTUAL ALLEGATIONS

4. On May 3, 2011, Joseph M. DiOrio, the Chapter 7 Trustee of the Bankruptcy proceeding (the "Trustee"), filed the Adversary Proceeding against Cronan and Merritt seeking avoidance of cash transfers, fraudulent transfers, property transfers and to recover the value thereof.
5. On November 30, 2012, the Bankruptcy Court entered the Default Judgment in favor of the Trustee and against the Defendants. The Judgment entered against (1) Cronan for damages in the amount of \$244,936.03, plus 12% interest; and against (2) Merritt for damages in the amount of \$16,400.00, plus 12% interest. See Exhibit A.
6. At all times relevant to the Adversary Proceeding, Cronan and Merritt both resided at 7 Brayton Woods Drive, Rehoboth, MA.
7. On November 20, 2024, the Bankruptcy Court entered an Order granting the Trustee's Motion for Approval of Sale of Judgment.

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8. On November 27, 2024, the Trustee entered into a written Assignment of the Judgment, a copy of which is attached hereto as Exhibit B, and pursuant to which 80 Fountain is now the Judgment Creditor.

9. On December 31, 2024, the Bankruptcy Court granted 80 Fountain's Motion for Issuance of Writs of Execution against Cronan and Meritt, See Exhibit C, which were duly issued the same day, See Exhibits D and E.

10. On January 3, 2025, the Bankruptcy Court certified the Judgment for registration in this district. See Exhibit F.

11. 80 Fountain is now seeking to register the Judgment in this Court, and, in accordance with M.G.L ch. 224, §§ 14 and 15, and Mass. R. Civ. P. Rule 69, to enforce the Judgment for the payment of money through execution and supplementary process.

WHEREFORE, the Plaintiff 80 Fountain hereby requests that this Court: (i) register the Judgment in this Court allowing 80 Fountain to continue forward with post-judgment collection procedures, (ii) issue executions with interest at twelve (12%) percent; and (iii) grant such other relief as is just and equitable.

Respectfully submitted,
80 FOUNTAIN STREET LLC
by its attorneys,

/s/ Blake J. Godbout

Blake J. Godbout, BBO# 196380
blake@bjgalaw.com
John T. Fiegel, Esq., BBO# 688904
jffiegel@bjglaw.com
GODBOUT LAW PLLC
33 Broad Street, 11th Floor
Boston, MA 02109
(617) 523-6677

Dated: January 6, 2025

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VERIFICATION

I, James P. Tiernan, Manager of 80 Fountain Street LLC, verify under oath that I have read this Verified Complaint and the factual allegations are true and accurate to the best of my knowledge, information or belief; and as to the allegations based upon information and belief; I believe this information also to be true; and no material facts have been omitted.

SWORN UNDER THE PAINS AND PENALTIES OF PERJURY THIS 4th DAY OF
JANUARY 2025.

James P. Tiernan

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Exhibit A

Date Filed 1/6/2025 5:12 PM
 Superior Court - Bristol
 Docket Number

UNITED STATES BANKRUPTCY COURT
 DISTRICT OF RHODE ISLAND

In re:

Bk. No. 10-10837

CLASSIC DISPLAY, INC.
 Debtor.

Chapter 7

JOSEPH M. DiORIO, CHAPTER 7
 TRUSTEE OF CLASSIC DISPLAY, INC.
 Plaintiff

Adv. Pro. No. 11-1036

v.

JAMES M. CRONAN and
 KAREN CRONAN
 Defendants.

DEFAULT JUDGMENT

It appearing that Default hereby entered, pursuant to Federal Rules of Bankruptcy Procedure 7037 and Federal Rules of Civil Procedure 37 in favor of the Plaintiff and against Defendants, on July 11, 2012, and based on the Affidavit of Frank R. DeLuca accompanying the Motion for Default Judgment, this Court enters Default Judgment in favor of Plaintiff and (1) against Defendant James M. Cronan for damages in the amount of \$244,936.03, plus interest; and (2) against Defendant Karen Cronan for damages in the amount of \$16,400.00, plus interest.

Diane Finkle

U.S. Bankruptcy Court Judge

Date: 11/30/2012

Date: September 18, 2012

I hereby certify that this instrument, document no. 55
 on 11/30/12, is a true and correct copy of the
 electronically filed/imaged original.

Attest: Jonathan E. Pincince, Clerk

U.S. Bankruptcy Court
 District of Rhode Island

By: *J. Pincince*
 Deputy Clerk

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Exhibit B

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UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND

In re: CLASSIC DISPLAY, INC.,

Case No.: 1:10-bk-10837

Debtor.

Chapter 7

**NOTICE OF ASSIGNMENT
OF JUDGMENT**

PLEASE TAKE NOTICE that the Judgment dated November 30, 2012, obtained by the Chapter 7 Trustee on behalf of Classic Display, Inc. in the Adversary Proceeding entitled *Joseph M. DiOrio, Chapter 7 Trustee for Classic Display, Inc. v James M. Cronan and Karen Cronan, Adv. Proc. No. 11-1036*, has been assigned to 80 Fountain Street, LLC, pursuant to the Assignment of Judgment annexed hereto as Exhibit A and the Order of the Bankruptcy Court, dated November 20, 2024, a copy of which is annexed hereto as Exhibit B.

Respectfully submitted,

80 FOUNTAIN STREET, LLC,

By its Attorneys,

/s/ Charles S. Beal

Charles S. Beal (#5559)
Beal Law, LLC
55 Pine Street, Suite 400
Providence, RI 02903
Tel.: (401) 270-6200
Fax: (401) 490-0117
cbeal@beallawllc.com

Date: December 5, 2024

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CERTIFICATE OF SERVICE

I hereby certify that, on December 5, 2024, I electronically filed the foregoing document in the above-captioned matter with the Clerk of the Bankruptcy Court for the District of Rhode Island using the CM/ECF system. The following CM/ECF participants will receive notice electronically:

- Joseph M. DiOrio jdiorio@pdlolaw.com, aperry@pdlolaw.com
- Edward G. Avila eavila@rcfp.com, mmacknight@rcfp.com
- Steven J. Boyajian sboyajian@rc.com, bvucci@rc.com
- Daniel E. Burgoyne dburgoyne@psh.com, kfrancois@psh.com
- Gary L. Donahue ustpreregion01.pr.ecf@usdoj.gov
- Sandra Nicholls Sandra.nicholls@usdoj.gov
- Constant S. Poholek cplawwassociates@comcast.net, rebeccaprizio@gmail.com,
poholekcr733344@notify.bestcase.com

I further certify that on December 5, 2024, I have mailed by United States Postal Service, postage pre-paid, the document to the following non CM-ECF participants:

James M. Cronan
25 Morgan Avenue
Warwick, RI 02889

Karen Merritt
91 Oak Street
Norton, MA 02766

/s/ Charles S. Beal

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 Exhibit Page 1 of 5

ASSIGNMENT OF JUDGMENT

For good and valuable consideration, receipt of which is hereby acknowledged, the undersigned Joseph M. DiOrto, Chapter 7 Trustee for the Bankruptcy Estate of Classic Display Inc. and not individually, (the "ASSIGNOR"), hereby assigns and transfers to 80 Fountain Street, LLC (the "ASSIGNEE"), without recourse, all right title and interest in and to a judgment issued by the United State Bankruptcy Court District of Rhode Island (the "Court") Docket No. 10-10837 dated September 18, 2012 against James M. Cronan in the amount of \$244,936.03, plus interest, and against Karen Cronan (Merriitt) in the amount of \$16,400.00, plus interest, a true copy of which is attached hereto as Exhibit A (the "Judgment").

1. Consideration. Consideration for the transfer is a warrant in favor of the ASSIGNEE for twenty-five thousand dollars (\$25,000).

2. ASSIGNOR's Representations. The ASSIGNOR represents and warrants that he is authorized to assign the Judgment by the Court pursuant to its Order attached hereto, and that no payments have been made on account of the Judgment.

3. ASSIGNEE's Representations. The ASSIGNEE represents and warrants that the issuance of the consideration was duly authorized.

4. General Provisions.

(a) Entire Agreement. This Assignment contains the entire agreement of the parties hereto with respect to the subject matter hereof and supersedes all prior understandings and agreements (oral and written) of the parties with respect to the subject matter hereof.

(b) Severability. If any term or other provision of this Agreement is invalid, illegal or incapable of being enforced by any rule of law or public policy, all other conditions and provisions of this Agreement shall nevertheless remain in full force and effect so long as the economic or legal substance of the transactions contemplated hereby is not affected in any manner adverse to any party. Upon such determination that any term or other provision is invalid, illegal or incapable of being enforced, the parties hereto shall negotiate in good faith to modify this Assignment so as to effect the original intent of the parties as closely as possible in an acceptable manner to the end that the transactions contemplated hereby are fulfilled to the greatest extent possible.

(c) Additional. This Assignment and the obligations of the ASSIGNOR and the ASSIGNEE hereunder shall be binding upon and inure to the benefit of the ASSIGNOR and the ASSIGNEE and their respective successors and assigns, shall be governed by and construed in accordance with the laws of Rhode Island and may not be modified or amended in any manner other than by a written agreement signed by the parties to be charged therewith. This agreement is intended to take effect as a sealed instrument.

IN WITNESS WHEREOF, the ASSIGNOR, Issuer, Guarantor and ASSIGNEE have caused this Purchase and Sale Agreement to be duly executed as of the date first above written.


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Exhibit Page 2 of 5

ASSIGNOR:

JOSEPH M. DIORIO, Chapter 7 Trustee

For the Bankruptcy Estate of Classic Display Inc., and not individually.



Signature

Date: 11/27/24

Joseph M. Diorio
[Name and Title] Trustee

ASSIGNEE:

80 FOUNTAIN STREET, LLC



Signature

Date: 11.27.24

James P. Tiernan, Member
[Name and Title]

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EXHIBIT A

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UNITED STATES BANKRUPTCY COURT
 DISTRICT OF RHODE ISLAND

In re:

Bk. No. 10-10837

CLASSIC DISPLAY, INC.
 Debtor.

Chapter 7

JOSEPH M. DIORIO, CHAPTER 7
 TRUSTEE OF CLASSIC DISPLAY, INC.
 Plaintiff

Adv. Pro. No. 11-1036

v.

JAMES M. CRONAN and
 KAREN CRONAN
 Defendants.

DEFAULT JUDGMENT

It appearing that Default hereby entered, pursuant to Federal Rules of Bankruptcy Procedure 7037 and Federal Rules of Civil Procedure 37 in favor of the Plaintiff and against Defendants, on July 11, 2012, and based on the Affidavit of Frank R. DeLuca accompanying the Motion for Default Judgment, this Court enters Default Judgment in favor of Plaintiff and (1) against Defendant James M. Cronan for damages in the amount of \$244,936.03, plus interest; and (2) against Defendant Karen Cronan for damages in the amount of \$16,400.00, plus interest.

Diane Finkle

U.S. Bankruptcy Court Judge

Date: 11/30/2012

Date: September 18, 2012

Date Filed 1/8/2025 5:12 PM
Superior Court - Bristol
Docket Number

Case 1:10-bk-10837 Doc 212-1 Filed 12/05/24 Entered 12/05/24 16:12:47 Desc
Exhibit Page 5 of 5

Case 1:10-bk-10837 Doc 209 Filed 11/20/24 Entered 11/20/24 13:47:12 Desc Main
Document Page 3 of 7

UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND

In re: Classic Display, Inc.
Debtor,

Case No. 1:10-bk-10837
Chapter 7

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2024, I electronically filed the foregoing document in the above-captioned matter with the Clerk of the Bankruptcy Court for the District of Rhode Island using the CM/ECF system. The following CM/ECF participants will receive notice electronically:

- Edward G. Avila eavila@rcfp.com, mmacknight@rcfp.com
- Steven J. Boyajian sboyajian@rc.com, bvucel@rc.com
- Daniel E. Burgoyne dburgoyne@psh.com, kfrancois@psh.com
- Gary L. Donahue ustpregion01.pr.ecf@usdoj.gov
- Sandra Nicholls sandra.nicholls@usdoj.gov
- Constant S. Poholek cplawassociates@comcast.net, rebecca.prizio@gmail.com; poholekcr73344@notify.bestcase.com

I further certify that on November 12, 2024, I have mailed by United States Postal Service, postage pre-paid, the document to the following non CM-ECF participants:

James Cronan
25 Morgan Avenue
Warwick RI 02889

Karen Merritt
7 Brayton Woods Drive
Rahoboth, MA 02769

And all parties identified on the Creditor Mailing Matrix attached hereto as Exhibit A.

/s/ Joseph M. DiOrto

Date Filed 1/6/2025 5:12 PM
Superior Court - Bristol
Docket Number

Case 1:10-bk-10837 Doc 212-2 Filed 12/05/24 Entered 12/05/24 16:12:47 Desc
Exhibit Page 1 of 7
Case 1:10-bk-10837 Doc 209 Filed 11/20/24 Entered 11/20/24 13:47:12 Desc Main
Document Page 1 of 7

UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND

In re: Classic Display, Inc.
Debtor,

Case No. 1:10-bk-10837
Chapter 7

ORDER GRANTING MOTION FOR APPROVAL OF SALE OF JUDGEMENTS

PURSUANT TO ~~11 U.S.C. § 363~~ AND

NOTICE OF INTENT TO SELL JUDGEMENTS BY PRIVATE

SALE AND INVITATION FOR COMPETING BIDS

This matter of the Trustee's Motion for Approval of the Sale of Judgments Pursuant to ~~11~~
~~U.S.C. § 363~~ and Notice of Intent to Sell Judgments by Private Sale and Invitation for Competing
Bid is hereby GRANTED.

- and in the Supplement to the Motion,
1. Based on the representations set forth in the Motion, the Motion is Granted;
 2. The Notice of Sale is Approved;
 3. The Sale is fair, fair and commercially reasonable, that the Judgments have been marketed in a fair and commercially reasonable manner, that all the terms and conditions of said sale are fair and commercially reasonable, that the Buyer is a good faith purchaser under ~~11 U.S.C. § 363(f)~~, that the sale is in the best interest of the bankruptcy estate and its creditors;
 4. Trustee is authorized to execute any and all documents necessary to consummate the sale with the Buyer or to any other Court-approved successful competing bidder.

Date: November 20th, 2024


The Honorable Diane Finkle
United States Bankruptcy Judge

Date Filed 1/6/2025 5:12 PM
Superior Court - Bristol
Docket Number

Case 1:10-bk-10837 Doc 212-2 Filed 12/05/24 Entered 12/05/24 16:12:47 Desc
Exhibit Page 2 of 7
Case 1:10-bk-10837 Doc 209 Filed 11/20/24 Entered 11/20/24 13:47:12 Desc Main
Document Page 2 of 7

Respectfully submitted,

/s/ Joseph M. DiOrio

Joseph M. DiOrio (#2616)

Amanda Perry Lepre (#9738)

PANNONE LOPES DEVEREAUX & O'GARA LLC

Northwoods Office Park

1301 Atwood Avenue, Suite 215N

Johnston, RI 02919

(401) 824-5180

(401) 824-5123 fax

jdiorio@pdlolaw.com

aperry@pdlolaw.com

Date: November 12, 2024

Date Filed 1/6/2025 5:12 PM
Superior Court - Bristol
Docket Number

Case 1:10-bk-10837 Doc 212-2 Filed 12/05/24 Entered 12/05/24 16:12:47 Desc
Exhibit Page 3 of 7
Case 1:10-bk-10837 Doc 209 Filed 11/20/24 Entered 11/20/24 13:47:12 Desc Main
Document Page 3 of 7

UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND

In re: Classic Display, Inc.

Debtor,

Case No. 1:10-bk-10837

Chapter 7

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2024, I electronically filed the foregoing document in the above-captioned matter with the Clerk of the Bankruptcy Court for the District of Rhode Island using the CM/ECF system. The following CM/ECF participants will receive notice electronically:

- Edward G. Avila eavila@rcfp.com, mmacknight@rcfp.com
- Steven J. Boyajian sboyajian@rc.com, bvucci@rc.com
- Daniel E. Burgoyne dburgoyne@psh.com, kfrancois@psh.com
- Gary L. Donahue ustpreion01.pr.ecf@usdoj.gov
- Sandra Nicholls sandra.nicholls@usdoj.gov
- Constant S. Poholek cplawassociates@comcast.net, rebecca.prizio@gmail.com; poholekcr73344@notify.bestcase.com

I further certify that on November 12, 2024, I have mailed by United States Postal Service, postage pre-paid, the document to the following non CM-ECF participants:

James Cronan
25 Morgan Avenue
Warwick RI 02889

Karen Merritt
7 Brayton Woods Drive
Rehoboth, MA 02769

And all parties identified on the Creditor Mailing Matrix attached hereto as Exhibit A.

/s/ Joseph M. DiOrio

Date Filed 1/6/2025 5:12 PM
Superior Court - Bristol
Docket Number

Case 1:10-bk-10837 Doc 212-2 Filed 12/05/24 Entered 12/05/24 16:12:47 Desc
Exhibit Page 4 of 7
Case 1:10-bk-10837 Doc 209 Filed 11/20/24 Entered 11/20/24 13:47:12 Desc Main
Document Page 4 of 7

Exhibit A

Date Filed 1/6/2025 5:12 PM
 Superior Court - Bristol
 Docket Number

Case 1:10-bk-10837 Doc 212-2 Filed 12/05/24 Entered 12/05/24 16:12:47 Desc
 Exhibit Page 5 of 7

Case 1:10-bk-10837 Doc 209 Filed 11/20/24 Entered 11/20/24 13:47:12 Desc Main
 Document Page 5 of 7

Label Matrix for local noticing
 0103-1
 Case 1:10-bk-10837
 District of Rhode Island
 Providence
 Tue Nov 12 12:33:53 EST 2024

Advanced Business Machines
 11 Powder Hill Road
 Lincoln, RI 02865-4407

Airgas
 17 Northwestern Drive
 Salem, NH 03079-4809

Allied Waste
 1080 Airport Road
 Fall River, MA 02720-4736

Edward G. Avila
 Roberts Carroll Feldstein & Peirce
 10 Weybosset Street - 8th floor
 Providence, RI 02903-2825

Steven J. Boyajian
 ROBINSON & COLE, LLP
 One Financial Plaza
 Suite 1430
 Providence, RI 02903-2485

Bristol County Savings Bank
 Attn. Carol Sweeney
 35 Broadway
 Taunton, MA 02780-3242

Broadway Tire, Inc.
 588 Broadway
 Pawtucket RI 02860-1297

Daniel E. Burgoynes
 Partridge Snow & Hahn LLP
 40 Westminister Street, Suite 1100
 Providence, RI 02903-2527

CIT Technology Fin Serv., Inc.
 PO Box 550599
 Jacksonville FL 32255-0599

CIT Technology Fin Serv., Inc.
 c/o Bankruptcy Processing Solutions Inc.
 1162 E. Sonterra Blvd., Suite 130
 San Antonio, TX 78258-4048

(p)CITIBANK
 PO BOX 790034
 ST LOUIS MO 63179-0034

Citibank, N.A.
 701 East 60th Street North
 SIOUX FALLS, SD 57104-0432

City of Pawtucket
 Rossi Law Offices
 28 Thurber Blvd Ste 1
 Smithfield RI 02917 1881

Classic Display, Inc.
 80 Fountain Street
 Pawtucket, RI 02860-1277

Commercial Heating Service & Sales
 46 Pine Swamp Road
 Cumberland, RI 02864-1002

Cox Communications
 9 J.F. Murphy Highway
 West Warwick, RI 02893-7528

Kristen Forbes Cuddy
 Law Office of Joseph M. DiOrio, Inc.
 144 Westminister Street
 Suite 302
 Providence, RI 02903-2216

Frank R. DeLuca
 Piccerelli Gilstein Company LLC
 144 Westminister Street
 Providence, RI 02903-2282

Dell Communication Credit
 PO Box 689020
 Des Moines IA 50368-9020

Department of Labor & Training
 1151 Pontiac Avenue
 Cranston, RI 02920 4407

Joseph M. DiOrio
 Law Office of Joseph M. DiOrio, Inc.
 144 Westminister Street
 Suite 302
 Providence, RI 02903-2216

Gary L. Donahue
 Office of the U.S. Trustee
 U.S. Courthouse
 One Exchange Terrace Suite 431
 Providence, RI 02903-1744

Edward G. Avila, Esquire
 Roberts, Carroll, Feldstein &
 10 Weybosset Street
 Providence RI 02903-2848

FedEx
 P.O. Box 371461
 Pittsburgh, PA 15250-7461

First Insurance Funding Corp.
 PO Box 66468
 Chicago IL 60666-0419

Lisa A. Gremia
 1350 Division Road
 Suite 102
 West Warwick, RI 02893-7553

(p)INTERNAL REVENUE SERVICE
 CENTRALIZED INSOLVENCY OPERATIONS
 PO BOX 7346
 PHILADELPHIA PA 19101-7346

Internal Revenue Service
 PO Box 7346
 Philadelphia, PA 19101-7346

Michael Karpinski
 832 Chopinist Hill Road
 N. Scituate, RI 02857-1039

Date Filed 1/6/2025 5:12 PM
 Superior Court - Bristol
 Docket Number

Case 1:10-bk-10837 Doc 212-2 Filed 12/05/24 Entered 12/05/24 16:12:47 Desc
 Exhibit Page 6 of 7

Case 1:10-bk-10837 Doc 209 Filed 11/20/24 Entered 11/20/24 13:47:12 Desc Main
 Document Page 6 of 7

MRS Associates, Inc.
 1930 Olney Avenue
 Cherry Hill NJ 08003-2016

National Grid
 300 Erie Blvd. West
 Syracuse, NY 13202-4250

National Grid
 Attn: Bankruptcy Dept.
 300 Erie Blvd. West
 Syracuse, NY 13202-4250

Sandra Nicholls
 U.S. Trustee's Office
 U.S. Courthouse
 One Exchange Terrace Suite 431
 Providence, RI 02903-1744

Ocean State Business
 Development Authority
 155 S. Main Street, #403
 Providence RI 02903-2963

Office Max
 HSBC Business Solutions
 PO Box 5239
 Carol Stream IL 60197-5239

Gardner H. Palmer Jr.
 Law Office of Joseph M. DiOrto, Inc.
 144 Westminster Street, Suite 302
 Providence, RI 02903-2216

Pawtucket Business Dev., Corp.
 175 Main Street
 Pawtucket RI 02860-4127

Amanda H. Perry
 Pannone Lopes Devereaux & O'Gara LLC
 1301 Atwood Avenue, Suite 215 N
 Johnston, RI 02919-4933

Constant S. Feholek Jr.
 30 Washington Street
 Attleboro, MA 02703-5531

R.I. Division of Taxation
 1 Capitol Hill
 Providence, RI 02908-5800

RI Division of Taxation
 Bankruptcy Unit
 Chief Collection Section
 One Capitol Hill
 Providence, RI 02908-5816

Andrew S. Richardson
 Boyajian Harrington & Richardson
 182 Waterman Street
 Providence, RI 02906-4015

SABIC Innovative Plastics US LLC
 ATTN: Val Venable
 9930 Kincoy Avenue
 Huntersville, NC 28078-6541

Sabic Palmar Shapes
 PO Box 905715
 Charlotte NC 28290-5715

Small Business Administration
 380 Westminster Hall
 Providence RI 02903-3239

State of RI - Division of Taxation
 RI Division of Taxation
 Bankruptcy Unit
 One Capitol Hill
 Providence, RI 02908-5800

State of RI - Labor and Training
 Legal Department
 Bldg 72 3rd Floor
 1511 Pontiac Avenue
 Cranston, RI 02920-4407

Tessiers General Store
 837 Central Avenue
 Pawtucket RI 02861-2150

The Hartford
 P.O. Box 7247-0234
 Philadelphia, PA 19170-0001

The Home Depot
 PO Box 6029
 The Lakes NV 88901-6029

Total Plastics, Inc.
 1661 Northfields Drive
 Rochester NY 48309-3825

Triangle Manufacturing Co.
 P.O. Box 1070
 Oshkosh, WI 54903-1070

UPS
 PO Box 7247-0244
 Philadelphia PA 19170-0001

WB Mason Co. Inc.
 P.O. Box 55840
 Boston, MA 02205-5840

Wesco Oil Company
 PO Box 17010
 Smithfield RI 02917-0701

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
 by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Date Filed 1/6/2025 5:12 PM
 Superior Court - Bristol
 Docket Number

Case 1:10-bk-10837 Doc 212-2 Filed 12/05/24 Entered 12/05/24 16:12:47 Desc
 Exhibit Page 7 of 7

Case 1:10-bk-10837 Doc 209 Filed 11/20/24 Entered 11/20/24 13:47:12 Desc Main Document Page 7 of 7	(d) Citibank, N.A. DBA 4740 121st St Urbandale, IA 50323	(d) Citibank, N.A. DBA 4740 121st Street Urbandale IA 50323	(d) Citibank, N.A. Payment Center, 4740 121st Street Urbandale, IA 50323
--	---	--	--

Internal Revenue Service
 Insolvency Unit 4th Floor
 380 Westminster Street
 Providence, RI 02903

(d) Internal Revenue Service
 Insolvency Unit - 4th Floor
 380 Westminster Street
 Providence, RI 02903

(d) Internal Revenue Service
 380 Westminster St, 4th Fl
 Providence, RI 02903

(d) Internal Revenue Service
 PO Box 21126
 Philadelphia, PA 19114

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Bristol County Savings Bank

(u) Commercial Heating Service

(d) Joseph M. DiOrio
 Law Office of Joseph M. DiOrio, Inc.
 144 Westminster Street
 Suite 302
 Providence, RI 02903-2216

(d) Michael Karpinski
 832 Chopmist Hill Road
 N. Scituate, RI 02857-1039

(d) State of RI - Labor and Training
 Legal Department
 Bldg 72 3rd Floor
 1511 Pontiac Avenue
 Cranston, RI 02920-4407

End of Label Matrix
 Mailable recipients 55
 Bypassed recipients 5
 Total 60

Date Filed 1/6/2025 5:12 PM
Superior Court - Bristol
Docket Number

Exhibit C

Date Filed 1/6/2025 5:12 PM
 Superior Court - Bristol
 Docket Number

UNITED STATES BANKRUPTCY COURT
 DISTRICT OF RHODE ISLAND

In re: **CLASSIC DISPLAY, INC.,**

Case No.: 1:10-bk-10837

Debtor.

Chapter 7

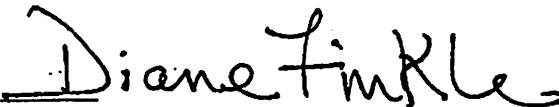
**80 FOUNTAIN STREET LLC'S MOTION FOR
 ISSUANCE OF A WRIT OF EXECUTION**

Pursuant to Fed. R. Bankr. P. 7069 and Fed. R. P. 69, 80 Fountain Street, LLC ("80 Fountain") hereby requests the issuance of a Writ of Execution in the form of the attached exhibits. In support of its Motion, 80 Fountain states as follows:

1. On May 3, 2011, Joseph M. DiOrio, the Chapter 7 Trustee of the herein Bankruptcy proceeding (the "Trustee"), filed an adversary proceeding Complaint against James M. Cronan ("Cronan") and Karen Cronan (now, Karen Merritt)¹ ("Merritt"), (*Adv. Pro. No. 11-1036*), seeking avoidance of the cash transfers, fraudulent transfers, property transfers and to recover the value thereof (the "Adversary Proceeding").
2. On November 30, 2012, this Court entered a Default Judgment (the "Judgment") in favor of the Trustee and against the Defendants James M. Cronan and Karen Cronan (now Karen Merritt) in the Adversary Proceeding. The Judgment entered against (1) Defendant Cronan for damages in the amount of \$244,936.03, plus 12% interest; and (2) against Defendant Merritt for damages in the amount of \$16,400.00, plus 12% interest.
3. On November 27, 2024, the Trustee entered into a written Assignment of the Judgment.


(A copy of the Assignment is annexed hereto as Exhibit 1.)

MOTION GRANTED.



12/31/24

¹ The Adversary Proceeding Defendants James M. Cronan and Karen Cronan are now divorced and Karen Cronan now goes by her maiden name, Karen Merritt.

I hereby certify that this instrument, document, or exhibit is a true and correct copy of the filed on 12/31/24 as a true and correct copy of the electronically filed/imaged original.
 Attest: Jonathan E. Pincince, Clerk
 U.S. Bankruptcy Court
 District of Rhode Island
 By:  Deputy Clerk

Date Filed 1/6/2025 5:12 PM
Superior Court - Bristol
Docket Number

4. On November 20, 2024, this Court entered an Order granting the Trustee's Motion for Approval of Sale of Judgment Pursuant to 11 U.S.C. §363 (the "Motion to Sell Judgments"). A copy of the Order granting the Motion to Sell Judgments is annexed hereto for the Court's reference as Exhibit 2. On December 5, 2024, a copy of the approved Assignment was filed with this Court.
5. Pursuant to the Assignment of the Judgment, 80 Fountain is now the Judgment Creditor, and requests issuance of a Writ of Execution on the Judgment.

WHEREFORE, in light of the foregoing, 80 Fountain requests that this Court:

1. Issue a Writ of Execution against James M. Cronan in the amount of \$244,936.03 plus accruing post judgment interest in the amount of 12% per annum from the date of November 30, 2012, until paid in full, in the form attached to this Motion as Exhibit 3;
2. Issue a Writ of Execution against Karen Merritt in the amount of \$16,400.00 plus accruing post judgment interest in the amount of 12% per annum from the date of November 30, 2012, until paid in full, in the form attached to this Motion as Exhibit 4; and

Date Filed 1/6/2025 5:12 PM
Superior Court - Bristol
Docket Number

3. Issue a Certificate of Judgment for Registration in Another District in the for attached to this Motion as Exhibit 5.

Respectfully submitted,
80 FOUNTAIN STREET, LLC,

By its Attorneys,

/s/ Charles S. Beal

Charles S. Beal (#5559)
Beal Law, LLC
55 Pine Street, Suite 400
Providence, RI 02903
Tel.: (401) 270-6200
Fax: (401) 490-0117
cbeal@beallawllc.com

Date: December 12, 2024

RULE 1005-1(D) NOTICE

PLEASE TAKE NOTICE that within fourteen (14) days after service, if served electronically, as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if served by mail or other excepted means specified, any party against whom such paper has been served, or any other party who objects to the relief sought, shall serve and file an objection or other appropriate response to said paper with the Bankruptcy Court Clerk's Office, 380 Westminster Street, 6th Floor, Providence, RI 02903, (401) 626-3100. If no objection or other response is timely filed, the paper will be deemed unopposed and will be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the Court, the interest of justice requires otherwise.

/s/ Charles S. Beal

Date Filed 1/6/2025 5:12 PM
Superior Court - Bristol
Docket Number

CERTIFICATE OF SERVICE

I hereby certify that, on December 12th, 2024, I electronically filed the foregoing document in the above-captioned matter with the Clerk of the Bankruptcy Court for the District of Rhode Island using the CM/ECF system. The following CM/ECF participants will receive notice electronically:

- Joseph M. DiOrio jdiorio@pdlolaw.com, aperry@pdlolaw.com
- Edward G. Avila eavila@rcfp.com, mmacknight@rcfp.com
- Steven J. Boyajian sboyajian@rc.com, bvucci@rc.com
- Daniel E. Burgoyne dburgoyne@psh.com, kfrancois@psh.com
- Gary L. Donahue ustpreion01.pr.ecf@usdoj.gov
- Sandra Nicholls Sandra.nicholls@usdoj.gov
- Constant S. Poholek cplawwassociates@comcast.net, rebeccaprizio@gmail.com,
poholekcr733344@notify.bestcase.com

I further certify that on December 6, 2024, I have mailed by United States Postal Service, postage pre-paid, the document to the following non CM-ECF participants:

James M. Cronan
25 Morgan Avenue
Warwick, RI 02889

Karen Merritt
91 Oak Street
Norton, MA 02766

/s/ Charles S. Beal

Date Filed 1/6/2025 5:12 PM
Superior Court - Bristol
Docket Number

Exhibit D

Date Filed 1/6/2025 5:12 PM
Superior Court - Bristol
Docket Number

UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND

In re: **CLASSIC DISPLAY, INC.,**
Debtor.

Case No.: 1:10-bk-10837
Chapter 7

WRIT OF EXECUTION

Judgment Creditor:
80 Fountain Street, LLC
80 Fountain Street
Pawtucket, RI 02860

Amount of Judgment:
\$244,936.03
Interest from: November 30, 2012 at a rate
of 12% post-judgment interest

Judgment Debtor:
James M. Cronan
25 Morgan Avenue
Warwick, RI 02889

**TO THE UNITED STATES MARSHAL FOR THE
DISTRICT OF RHODE ISLAND:**

YOU ARE DIRECTED to levy upon the goods and chattels and real estate of the said
JAMES M. CRONAN within your precinct, and cause to be levied and paid unto the said 80
FOUNTAIN STREET, LLC the aforesaid sums, being \$244,936.03, plus post-judgment interest
in the whole, and thereof also to satisfy yourself for your own fees.

NOTICE TO THE JUDGMENT DEBTOR:

You are notified that federal and state exemptions may be available to you and that you
have a right to seek a Court order releasing as exempt any property specified in the Marshal's
schedule from levy.

Date: December 31, 2024

Clerk: 

Clerk of the Bankruptcy Court

UNITED STATES MARSHAL'S RETURN

I received this Writ on _____, 2024, and executed the same
on _____, 2024.

United States Marshal

I hereby certify that this instrument, document no. 217,
filed on 12/31/2024 is a true and correct copy of the
electronically filed/imaged original.

Attest: Jonathan E. Pincince, Clerk

U.S. Bankruptcy Court
District of Rhode Island

By: 

Deputy Clerk

Deputy Marshal

Date Filed 1/6/2025 5:12 PM
Superior Court - Bristol
Docket Number

Exhibit E

Date Filed 1/6/2025 5:12 PM
Superior Court - Bristol
Docket Number

UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND

In re: CLASSIC DISPLAY, INC.,
Debtor.

Case No.: 1:10-bk-10837
Chapter 7

WRIT OF EXECUTION

Judgment Creditor:
80 Fountain Street, LLC
80 Fountain Street
Pawtucket, RI 02860

Amount of Judgment:
\$16,400.00
Interest from: November 30, 2012 at a rate
of 12% post-judgment interest

Judgment Debtor:
Karen Merritt
91 Oak Street
Norton, MA 02766

TO THE UNITED STATES MARSHAL FOR THE
DISTRICT OF RHODE ISLAND:

YOU ARE DIRECTED to levy upon the goods and chattels and real estate of the said
KAREN MERRITT within your precinct, and cause to be levied and paid unto the said 80
FOUNTAIN STREET, LLC the aforesaid sums, being \$16,400.00, plus post-judgment interest in
the whole, and thereof also to satisfy yourself for your own fees.

NOTICE TO THE JUDGMENT DEBTOR:

You are notified that federal and state exemptions may be available to you and that you
have a right to seek a Court order releasing as exempt any property specified in the Marshal's
schedule from levy.

Date: December 31, 2024

Clerk: 
Clerk of the Bankruptcy Court

UNITED STATES MARSHAL'S RETURN

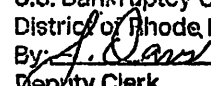
I received this Writ on _____, 2024, and executed the same
on _____, 2024.

United States Marshal

I hereby certify that this instrument, document no 218
filed on 12/31/2024 is a true and correct copy of the
electronically filed/imaged original.

Attest: Jonathan E. Pincince, Clerk

U.S. Bankruptcy Court
District of Rhode Island

By: 
Deputy Clerk

Deputy Marshal

Date Filed 1/8/2025 5:12 PM
Superior Court - Bristol
Docket Number

Exhibit F

Date Filed 1/6/2025 5:12 PM
 Superior Court - Bristol
 Docket Number

B2650 (Form 2650) (12/15)

United States Bankruptcy Court

District Of Rhode Island

In re Classic Display, Inc.
 Debtor
 Joseph M. DiOrto, Chapter 7
 Trustee of Classic Display, Inc.
 Plaintiff

Case No. 10-10837Chapter 7

v.
James M. Cronan & Karen Cronan
 Defendant

Adv. Proc. No. 11-1036

CERTIFICATION OF JUDGMENT FOR REGISTRATION IN ANOTHER DISTRICT

I, clerk of the United States Bankruptcy Court, do certify that the attached judgment is a true and correct copy of the original judgment entered in this proceeding on November 30, 2012 as it appears in the records of this court, and that: (date)

☒ No notice of appeal from this judgment has been filed, and no motion of the kind set forth in Federal Rule of Civil Procedure 60, as made applicable by Federal Rule of Bankruptcy Procedure 9024, has been filed.

☐ No notice of appeal from this judgment has been filed, and any motions of the kind set forth in Federal Rule of Civil Procedure 60, as made applicable by Federal Rule of Bankruptcy Procedure 9024, have been disposed of, the latest order disposing of such a motion having been entered on _____ (date)

☐ An appeal was taken from this judgment, and the judgment was affirmed by mandate of the _____ issued on _____ (name of court) (date)

☐ An appeal was taken from this judgment, and the appeal was dismissed by order entered on _____ (date)

The referenced Judgment was transferred to 80 Fountain Street, LLC
 By Order of Judge Finkle on November 20, 2024.


 Clerk of the Bankruptcy Court

By:


 Deputy Clerk

1/3/2025
 Date

EXHIBIT 5

Date Filed 1/13/2025 11:21 AM
 Superior Court - Bristol
 Docket Number 2573CV00006

#5

Commonwealth of Massachusetts

BRISTOL, ss.

TRIAL COURT OF THE COMMONWEALTH
 SUPERIOR COURT DEPARTMENT
 CIVIL DOCKET NO. 25 CV 00006

80 Fountain Street, LLC, PLAINTIFF(S)

BRISTOL SUPERIOR COURT
 FILED

v.

James M. Cronan and, DEFENDANT(S)
Karen Merritt

JAN 13 2025

SUMMONS

JENNIFER A. SULLIVAN, ESQ.
 CLERK/MAGISTRATE

THIS SUMMONS IS DIRECTED TO Karen Merritt, (Defendant's name)

You are being sued. The Plaintiff(s) named above has started a lawsuit against you. A copy of the Plaintiff's Complaint filed against you is attached to this summons and the original complaint has been filed in the Bristol Superior Court. **YOU MUST ACT PROMPTLY TO PROTECT YOUR RIGHTS.**

1. **You must respond to this lawsuit in writing within 20 days.** If you do not respond, the court may decide the case against you and award the Plaintiff everything asked for in the complaint. You will also lose the opportunity to tell your side of the story. You must respond to this lawsuit in writing even if you expect to resolve this matter with the Plaintiff. If you need more time to respond, you may request an extension of time in writing from the Court.
2. **How to respond.** To respond to this lawsuit, you must file a written response with the court and mail a copy to the Plaintiff's Attorney (or Plaintiff, if unrepresented). You can do this by:
 - a. Filing or mailing your signed original Answer to the Clerk's Office for Civil Business, Court, 9 Court Street, Taunton, MA 02780 (address), by mail or in person, **AND**
 - b. Delivering or mailing a copy of your response to the Plaintiff's Attorney/Plaintiff at the following address: 33 Broad St., 11th Fl., Boston, MA 02109
3. **What to include in your response.** An "Answer" is one type of response to a Complaint. Your Answer must state whether you agree or disagree with the fact(s) alleged in each paragraph of the Complaint. Some defenses, called affirmative defenses, must be stated in your Answer or you may lose your right to use them in court. If you have any claims against the Plaintiff (referred to as counterclaims) that are based on the same facts or transaction described in the Complaint, then you must include those claims in your Answer. Otherwise, you may lose your right to sue the Plaintiff about anything related to this lawsuit. If you want to have your case heard by a jury, you must specifically request a jury trial in your Answer or in a written demand for a jury trial that you must send to the other side and file with the court no more than 10 days after sending your Answer. You can also respond to a Complaint by filing a "Motion to Dismiss," if you believe that the complaint is legally invalid or legally insufficient. A Motion to Dismiss must be based on one of the legal deficiencies or reasons list under Mass.R.Civ.P. 12. If you are filing the Motion to Dismiss, you must also comply with the filing procedures for "Civil Motions" described in the rules of the Court in which the complaint was filed, available at www.mass.gov/courts/case-legal-res/rulesofcourt.

- Witness, Hon. Michael D. Ricciuti, Chief Justice on _____, 20____

NOTE: The number assigned to the Complaint by the Clerk-Magistrate at the beginning of the lawsuit should be indicated on the summons before it is served on the Defendant.

I hereby certify that on _____, 20____, I served a copy of this summons, together with a copy of the complaint in this action, on the defendant named in this summons, in the following manner (See Mass.R.Civ.P. 4(d)(1-5)):

Dated: _____, 20__ **Signature:** _____

PLEASE ENTER THE DATE THAT YOU MADE SERVICE ON THE DEFENDANT IN THIS BOX - BOTH ON THE ORIGINAL SUMMONS AND ON THE COPY OF THE SUMMONS SERVED ON THE DEFENDANT.

--

Date Filed 1/13/2025 11:21 AM
Superior Court - Bristol
Docket Number 2581CV03906

Proof of Service of Process

January 9, 2025

I hereby certify and return that on January 9, 2025, I served a copy of the within summons and together with a copy of the complaint in this action, on the defendant named in this summons, in the following manner (See Mass. R. Civ.P.4(d)(1-5))
By giving in hand to Karen Merritt a true and attested copy thereof
To wit:

91 Oak Street

Norton, Massachusetts

Time of Service: 11:45AM

Service and Travel: \$95.00



Ronald Spear
Constable and Disinterested Person
84 Park Avenue, Worcester, MA 01609

N.B. TO PROCESS SERVER:-

**PLEASE ENTER THE DATE THAT YOU MADE SERVICE ON THE DEFENANT IN THIS BOX
- BOTH ON THE ORIGINAL SUMMONS AND ON COPY OF THE SUMMONS SERVED ON THE
DEFENDANT.**

Dated January 9, 2025

****Served along with Civil Action Cover Sheet, Complaint to Register Judgement with Exhibits 'A' through
Exhibit 'F', Civil Tracking Order, Motion for Special Process Server (allowed).**

EXHIBIT 6

Date Filed 1/17/2025 11:55 AM
 Superior Court - Bristol
 Docket Number 2573CV00006

#6

Commonwealth of Massachusetts

BRISTOL, ss.

TRIAL COURT OF THE COMMONWEALTH
 SUPERIOR COURT DEPARTMENT
 CIVIL DOCKET NO. 25 CV 00006

80 Fountain Street, LLC, PLAINTIFF(S)

BRISTOL SUPERIOR COURT
 FILED

v.

James M. Cronan and DEFENDANT(S)
Karen Merritt

JAN 17 2025

SUMMONS

JENNIFER A. SULLIVAN, ESQ.
 CLERK/MAGISTRATE

THIS SUMMONS IS DIRECTED TO James M. Cronan (Defendant's name)

You are being sued. The Plaintiff(s) named above has started a lawsuit against you. A copy of the Plaintiff's Complaint filed against you is attached to this summons and the original complaint has been filed in the Bristol Superior Court. **YOU MUST ACT PROMPTLY TO PROTECT YOUR RIGHTS.**


1. **You must respond to this lawsuit in writing within 20 days.** If you do not respond, the court may decide the case against you and award the Plaintiff everything asked for in the complaint. You will also lose the opportunity to tell your side of the story. You must respond to this lawsuit in writing even if you expect to resolve this matter with the Plaintiff. If you need more time to respond, you may request an extension of time in writing from the Court.
2. **How to respond.** To respond to this lawsuit, you must file a written response with the court and mail a copy to the Plaintiff's Attorney (or Plaintiff, if unrepresented). You can do this by:
 - a. Filing or mailing your signed original Answer to the Clerk's Office for Civil Business,
Court, 9 Court St., Taunton, MA 02780 (address),
 by mail or in person, **AND**
 - b. Delivering or mailing a copy of your response to the Plaintiff's Attorney/Plaintiff at the following address: 33 Broad St., 11th Fl., Boston, MA 02109
3. **What to include in your response.** An "Answer" is one type of response to a Complaint. Your Answer must state whether you agree or disagree with the fact(s) alleged in each paragraph of the Complaint. Some defenses, called affirmative defenses, must be stated in your Answer or you may lose your right to use them in court. If you have any claims against the Plaintiff (referred to as counterclaims) that are based on the same facts or transaction described in the Complaint, then you must include those claims in your Answer. Otherwise, you may lose your right to sue the Plaintiff about anything related to this lawsuit. If you want to have your case heard by a jury, you must specifically request a jury trial in your Answer or in a written demand for a jury trial that you must sent to the other side and file with the court no more than 10 days after sending your Answer. You can also respond to a Complaint by filing a "Motion to Dismiss," if you believe that the complaint is legally invalid or legally insufficient. A Motion to Dismiss must be based on one of the legal deficiencies or reasons list under Mass.R.Civ.P. 12. If you are filing the Motion to Dismiss, you must also comply with the filing procedures for "Civil Motions" described in the rules of the Court in which the complaint was filed, available at www.mass.gov/courts/case-legal-res/rulesofcourt.

1/11/25 1:10 pm
 Cindy Wilson

Date Filed 1/17/2025 11:55 AM
 Superior Court - Bristol
 Docket Number 2573CV00006

4. **Legal Assistance.** You may wish to get legal help from a lawyer. If you cannot get legal help, some basic information for people who represent themselves is available at www.mass.gov/courts/selfhelp.
5. **Required information on all filings:** The "civil docket number" appearing at the top of this notice is the case number assigned to this case and must appear on the front of your Answer or Motion to Dismiss.

Witness, Hon. Michael D. Ricciuti, Chief Justice on _____, 20__.


 Jennifer A. Sullivan, Esquire
 Clerk of Courts

NOTE: The number assigned to the Complaint by the Clerk-Magistrate at the beginning of the lawsuit should be indicated on the summons before it is served on the Defendant.

PROOF OF SERVICE OF PROCESS

I hereby certify that on Jan 11, 2025, I served a copy of this summons, together with a copy of the complaint in this action, on the defendant named in this summons, in the following manner (See Mass.R.Civ.P. 4(d)(1-5)): by leaving a copy at his usual place of abode 25 Morgan Ave. Weymouth Beach Island 02889 with a person of suitable age and discretion (Cindy Wilson) on 1/11/2025 at 1:00pm

Dated: 1/11, 2025

Signature: 

N.B. TO PROCESS SERVER: 1:00pm

Joseph Clark
 Constable Lic # 6026

PLEASE ENTER THE DATE THAT YOU MADE SERVICE ON THE DEFENDANT IN THIS BOX - BOTH ON THE ORIGINAL SUMMONS AND ON THE COPY OF THE SUMMONS SERVED ON THE DEFENDANT.

1/11/2025

EXHIBIT 7

#8

BRISTOL SUPERIOR COURT
FILED

JAN 21 2025

JENNIFER A. SULLIVAN, ESQ
CLERK/MAGISTRATE

Clerk's Office for Civil Business
9 Court Street
Taunton, MA 02780

Re: Verified Request for Extension of Time to Respond to Summons Under the ADA
Civil Docket No. 25CV00006

Dear Clerk of the Court,

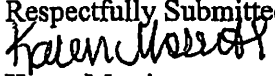
I am writing to respectfully request an extension of time to respond to the summons in the case Civil Docket No. 25CV00006. Due to my disability, I require additional time to gather necessary evidence and prepare my response.

In accordance with the Americans with Disabilities Act (ADA), I am requesting a reasonable accommodation of an additional 30 days to file my response, which would be March 2, 2025.

This additional time will allow me to adequately address the complex issues involved in this case and ensure a fair opportunity to present my defense.

Additionally, my medical reports are private, and if required, I request instructions on how to submit them to the court under seal to ensure my privacy.

Thank you for considering my request. Please let me know if any additional documentation or information is required to support this request.

Respectfully Submitted,

Karen Merritt
91 Oak Street
Norton, MA 02766
508-239-4924

Verified Motion Declaration:

"I, Karen Merritt, declare under penalty of perjury under the laws of the Commonwealth of Massachusetts that the foregoing is true and correct to the best of my knowledge and belief.

Dated this 21st day of January, 2025.

Respectfully Submitted,


Karen Merritt

CERTIFICATE OF SERVICE

I hereby certify that on the 21st Day of January 2025, I filed and served a true copy of this document upon each party appearing pro se and the attorney of record for each other party via email to:

Charles Beal

Beal Law, LLC

55 Pine street, Suite 400

Providence, RI 02903

EXHIBIT 8

Date Filed 1/29/2025 4:05 PM
 Superior Court - Bristol
 Docket Number 2573CV00006

11

COMMONWEALTH OF MASSACHUSETTS

BRISTOL, ss.

BRISTOL SUPERIOR COURT
 CIVIL ACTION NO. 2573CV00006

 80 FOUNTAIN STREET, LLC)
)
 Plaintiff,)
)
 v.)
)
 JAMES CRONAN and)
 KAREN MERRITT)
)
 Defendants.)

BRISTOL,SS SUPERIOR COURT
 FILED

JAN 29 2025

JENNIFER A. SULLIVAN, ESQ.
 CLERK / MAGISTRATE

PLAINTIFF 80 FOUNTAIN STREET, LLC'S OPPOSITION TO DEFENDANT KAREN MERRITT'S REQUEST FOR EXTENSION TO ANSWER COMPLAINT

NOW COMES Plaintiff 80 Fountain Street, LLC (the "Plaintiff"), and submits its opposition to Defendant Karen Merritt's (the "Defendant") request for additional time to file an answer in this case. This action is a purely administrative proceeding to domesticate a Rhode Island judgment, against which there is no cognizable defense, for which the Defendant has already been twice defaulted, and for which Final Judgment has entered. Consequently, any putative answer would be wholly frivolous. In support thereof, the Plaintiff states further as follows:

1. On May 16, 2011, Joseph M. DiOrio, the Chapter 7 Trustee of the Bankruptcy proceeding (the "Trustee"), filed the Adversary Proceeding against Cronan and Merritt seeking avoidance of cash transfers, fraudulent transfers, property transfers and to recover the value thereof. See Docket entry No. 1, United States Bankruptcy Court, District of

Date Filed 1/29/2025 4:05 PM
Superior Court - Bristol
Docket Number 2573CV00006

Rhode Island, Adversary Proceeding: 1:11-ap-01036 ("Adversary Docket"), Exhibit A.

2. Summonses for the Complaint were served and executed on both Defendants. See Adversary Docket entry Nos. 10 and 11, Exhibit A.

3. On November 30, 2012, the Bankruptcy Court entered the Default Judgment in favor of the Trustee and against the Defendants. The Judgment entered against (1) Cronan for damages in the amount of \$244,936.03, plus 12% interest; and against (2) Merritt for damages in the amount of \$16,400.00, plus 12% interest. See Default Judgment, Exhibit B.

4. Any appeal or motion to reconsider the Default Judgment was due by December 12, 2012, but no such appeal or motion to reconsider was filed. See Adversary Docket entry No. 55, Exhibit A.

5. Writs of execution were issued and served on both Defendants. See Adversary Docket entry Nos. 61, 62, 64, and 65, Exhibit A.

6. On March 26, 2015, The Trustee then filed a complaint to register the Default Judgment in Massachusetts. See Complaint to Register Judgment, Exhibit C.

7. Summonses for the complaint were served and executed on both Defendants. See Docket entry Nos. 3 and 4, 1573CV00296, Joseph M Diorio, Chapter 7 Trustee of Classic Display, Inc. vs James M. Cronan, et al ("Massachusetts Docket"), Exhibit D.

8. More than three months after filing the returns of service, and after no response or objection from the Defendant, the Trustee sought and obtained a default judgment in the Massachusetts action pursuant to Mass. R. Civ. P. 55(a). See Docket entry No. 10, Massachusetts Docket, Exhibit D.

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Superior Court - Bristol
Docket Number 2573CV00006

9. The Trustee also sought and obtained Writs of Execution against both Defendants, also without opposition. See Docket entry Nos. 11-13, Massachusetts Docket, Exhibit D.

10. On November 20, 2024, the Bankruptcy Court approved the Trustee's sale of the Default Judgment to the Plaintiff, and sent notice of same to the Defendants. See Order Granting Motion for Approval of Sale of Judgments Pursuant to 11 U.S.C. §363 and Notice of Intent to Sell Judgments by Private Sale and Invitation for Competing Bids, Exhibit E.

11. The Defendant did not dispute the Sale.

12. Pursuant to the written Assignment of the Judgment, the Plaintiff is now the Judgment Creditor of the Default Judgment against the Defendants in the Adversary Proceeding, succeeding the Trustee in all right, title, and interest in and to the Default Judgment. See Assignment of Judgment, Exhibit F.

13. After consummation of the Assignment, the Plaintiff sought and received Writs of Execution in favor of the Plaintiff against the Defendant in Rhode Island. See Writs of Execution, Exhibit G.

14. Prior to filing the instant action, the Plaintiff sought and received certification from the Bankruptcy Court that no appeal has been filed. See Certification of Judgment for Registration in Another District, Exhibit H.

15. The original Default Judgment was issued more than twelve years ago, and the Defendant was again defaulted when the Trustee, the Plaintiff's predecessor in interest, registered that judgment in Massachusetts nearly ten years ago.

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Docket Number 2573CV00006

16. The Defendant, the very same who was defaulted in the Trustee's action to register the Default Judgment in Massachusetts, now seeks an extension of time to answer the Plaintiff's attempt to register the same Default Judgment as the Trustee's successor in interest.

17. No extension of time is warranted, however, because the Defendant is precluded from raising any defense to the registration of the Default Judgment by the doctrine of *res judicata*, specifically claim preclusion.

18. "Claim preclusion makes a valid, final judgment conclusive on the parties and their privies, and prevents relitigation of all matters that were or could have been adjudicated in the action." Kobrin v. Board of Registration in Med., 444 Mass. 837, 843, 832 N.E.2d 628 (2005), quoting O'Neill v. City Manager of Cambridge, 428 Mass. 257, 259, 700 N.E.2d 530 (1998).

19. "[C]laim preclusion requires three elements: '(1) the identity or privity of the parties to the present and prior actions, (2) identity of the cause of action, and (3) prior final judgment on the merits.'" Kobrin, 444 Mass. at 843, quoting DaLuz v. Department of Correction, 434 Mass. 40, 45, 746 N.E.2d 501 (2001).

20. All three elements are clearly present in this case.

21. The Trustee's assignment of the Default Judgment to the Plaintiff, by which it succeeded to all right, title, and interest in and to the Default Judgment, means that the Plaintiff is in privity with the Trustee with respect to all matters pertaining to the Default Judgment, including any and all efforts to collect on it against the Defendants.

22. This cause of action is identical in all facets to the registration of judgment action filed by the Trustee. It seeks to register the exact same Default Judgment issued in the

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Docket Number 2573CV00006

Adversary Proceeding. See Exhibit C and the Verified Complaint filed in this case.

23. For claim preclusion purposes, the Default Judgment obtained by the Trustee in the Massachusetts action to register the original Default Judgment issued in the Adversary Proceeding operates as a final disposition of the claims in that action, and has the same conclusive effect on the parties to that action as a judgment entered after a trial on the merits would have had. See Riehle v. Margolies, 279 U.S. 218, 225, 49 S.Ct. 310, 73 L.Ed. 669 (1929); United States v. \$23,000 in United States Currency, 356 F.3d 157, 163 (1st Cir.2004).

24. All three elements of claim preclusion having been satisfied, the Defendant can offer no non-frivolous defense of the Complaint in this action, and therefore should not be entitled to any extension of time to answer.

25. Finally, to the extent that the Defendant intends to use this forum to contest the underlying claims giving rise to the Default Judgment issued more than twelve years ago, the time to do so has long since passed.

WHEREFORE, Plaintiff 80 Fountain Street, LLC, requests that the Court DENY the Defendant's request for additional time to respond to the Complaint.

Respectfully Submitted,
80 FOUNTAIN STREET, LLC
By their attorney,

/s/ Blake J. Godbout

Blake J. Godbout, BBO# 196380
blake@bjgalaw.com
John T. Fiegel, Esq., BBO# 688904
jffiegel@bjgalaw.com
GODBOUT LAW PLLC
33 Broad Street, 11th Floor
Boston, MA 02109
Tel: 617-523-6677

Dated: January 24, 2025

Date Filed 1/29/2025 4:05 PM
Superior Court - Bristol
Docket Number 2573CV00006

CERTIFICATE OF SERVICE

On January 24, 2025, I served a true copy of the above document via email and first-class mail upon:

James M. Cronan
Email: mikecronan123@gmail.com
25 Morgan Avenue
Warwick, RI 02889

Karen Merritt
Email: karen.hgm@aol.com
91 Oak Street
Norton, MA 02766

/s/ Blake J. Godbout

Blake J. Godbout

EXHIBIT 9

11.1

COMMONWEALTH OF MASSACHUSETTS

BRISTOL, ss.

BRISTOL SUPERIOR COURT
CIVIL ACTION NO. 2573CV00006

80 FOUNTAIN STREET, LLC)
Plaintiff,)
v.)
JAMES CRONAN and)
KAREN MERRITT)
Defendants.)

BRISTOL,SS SUPERIOR COURT
FILED

JAN 29 2025

JENNIFER A. SULLIVAN, ESQ.
CLERK/MAGISTRATE

PLAINTIFF'S REQUEST FOR ORAL ARGUMENT

NOW COMES the Plaintiff 80 Fountain Street, LLC, and respectfully request that the Court schedule Oral Arguments for the Defendant Karen Merritt's request for additional time to file an answer in this case.

Respectfully Submitted,
80 FOUNTAIN STREET, LLC
By their attorney,

/s/ Blake J. Godbout

Blake J. Godbout, BBO# 196380
blake@bjgalaw.com
John T. Fiegel, Esq., BBO# 688904
jffiegel@bjgalaw.com
GODBOUT LAW PLLC
33 Broad Street, 11th Floor
Boston, MA 02109
Tel: 617-523-6677

Dated: January 24, 2025

CERTIFICATE OF SERVICE

On January 24, 2025, I served a true copy of the above document via email and first-class mail upon:


James M. Cronan
Email: mikecronan123@gmail.com
25 Morgan Avenue
Warwick, RI 02889

Karen Merritt
Email: karen.hgm@aol.com
91 Oak Street
Norton, MA 02766

/s/ Blake J. Godbout

Blake J. Godbout

EXHIBIT 10

NOTICE TO APPEAR FOR MOTION HEARING	DOCKET NUMBER 2573CV00006	Massachusetts Trial Court The Superior Court Department 
CASE NAME 80 Fountain Street, LLC vs. Cronan, James et al		Jennifer A Sullivan Bristol County
TO: Karen Merritt 91 Oak Street Norton, MA 02766		COURT NAME AND ADDRESS Bristol County Superior Court - Taunton 9 Court Street, Rm 13 Taunton, MA 02780
<p>The Court will hear the following event: MOTION HEARING</p> <p>Counsel should appear as follows: Date: 02/27/2025 Time: 02:00 PM Event Type: In Person</p> <p>Session/ Courtroom Location: Main Courtroom</p>		
<p>Further Orders of the Court.</p> <div style="border: 1px solid black; padding: 10px;"> <p>#9 Karen Merritt's Request for Extension of Time to Respond with Opposition #10 James Cronan's Request for Extension of Time to Respond with Opposition #13 Motion to Provide Medical Documentation Under Seal #14 Motion for Clarification and Extension of Time Under the ADA #15 Motion for Reasonable Accommodations Under the ADA #16 Motion to Respond to Opposing Counsel's Request to Deny Extension</p> </div>		
DATE ISSUED 2/5/25	ASSOCIATE JUSTICE Hon. Katie Rayburn	

SCV012a 01/15/2024

www.mass.gov/courts

Date/Time Printed: 02-05-2025 12:40:26

#14 80 Fountain Street's Motion to Substitute as Plaintiff and for Reissuance of Execution with Opposition